

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

MICHAEL P. SWEENEY &  
REGINA P. SWEENEY

: CHAPTER 13

: NO. 13-20421/AMC

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**DEBTOR'S RESPONSE  
TO MOTION OF TOYOTA MOTOR CREDIT CORPORATION  
FOR RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362(d)(1)**

**RESPONSE**

Respondents, Michael and Regina Sweeney, by and through their counsel, Bradley

E. Allen, Esquire, hereby answers Movant's Motion and avers the following:

1. Admitted.

2. Admitted.

3. Admitted.

4. Denied. The averment in this paragraph is a legal conclusion to which no response is required and is therefore deemed denied.

5. Denied. The averment in this paragraph is a legal conclusion to which no response is required and is therefore deemed denied.

6. - 10. Denied. The averments in these paragraphs are legal conclusions to which no response is required and is therefore deemed denied.

WHEREFORE, Debtor's, respectfully requests that the Motion of Toyota Motor Credit Corporation for Relief from the Automatic Stay Under Section 362(d) be denied.

Date: September 11, 2018

/s/BRADLY E. ALLEN

BRADLY E. ALLEN

Attorney for Debtors

**IN THE UNITED STATES BANKRUPTCY COURT  
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**ORDER**

AND NOW, this                      day of                      , 2018, it is hereby ORDERED  
AND DECREED that Movant, Toyota Motor Credit Corporation Motion for Relief from  
the Automatic Stay is hereby denied.

BY THE COURT;

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HONORABLE ASHELY M. CHAN  
U.S. BANKRUPTCY JUDGE